

Before The
Federal Communications Commission
Washington DC 20554

In the matter of

**Amendment of Part 97 of the Commissions
rules to implement WRC 03 regulations
applicable to requirements for operators
licensees for the amateur Radio Service**

**WT Docket No. 05-235
RM.-10867, *et al.***

To: The Commission

Reply to Comments of the ARRL

The entry-level license proposed by the ARRL is ill advised and is unnecessary to promote quality growth in the Amateur Radio Service. The primary barrier to growth of the number of licensed Radio Amateurs is the Morris code requirement. This is also the barrier that has interfered with upgrading of Technician licensees to General Class.

Potential applicants have been discouraged from entering Amateur Radio by way of the Technician Class License because the Morris code requirement was required for the next step, the General Class license. They were not discouraged by having to pass element 3 in order to obtain H.F. privileges as the ARRL contends.

Elements 2 and 3 are very simple tests. They are multiple choice formats and administered by volunteer examiners. There are frequent testing opportunities. The entire question pool is published and sample tests are available on line using exact questions from the question pool. The requirement to pass element 2 and 3 will not be a barrier to anybody with a sincere interest in Amateur Radio.

The New entry level license will only serve those who wish to obtain H.F. privileges but are unwilling to put forth even the very minimum effort to pass elements 2 and 3. This will add very little additional growth to Amateur Radio and even less quality growth.

The ARRL states that the notice proposal creates an anomaly because the Technician and Technician Plus licensees have different privileges. A simple solution to this is to grant all privileges now afforded to Technician Plus licensees to all Technician licensees. They should not be granted any additional privileges beyond this and should not be granted phone privileges below 28 MHz.

I would like to take this opportunity to point out a loophole that is allowing unqualified people to become Amateur Radio Licensees. Frequently people who are not properly prepared take the same element repeatedly at the same VE session until they become "lucky" and manage to obtain a passing score. The FCC should prohibit taking the same element more than once at the same VE session. This would not require additional record keeping and would discourage this practice.

I am a Life Member of the ARRL and have held an Amateur Extra Class license for over 25 years. I have held a FCC First Class Radiotelephone License followed by the subsequent General Radiotelephone License for 36 years. I am a strong supporter of the ARRL. Unfortunately their proposal for a new entry-level license does not represent my views.

Respectfully,

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